

## Railroad Avenue Bridges

Over Fornat Wash (Br. No. 56C0099; FPN BRLO-5956(228))

and

Over East Channel Stubbe Wash (Br. No. 56C0101; FPN BRLO-5956(229))

## Section 4(f) De Minimis Impact Determination

Submitted Pursuant to:

49 USC 303

THE STATE OF CALIFORNIA

Department of Transportation as assigned

Approved By: *Aaron Burton* Date: June 17, 2022  
Aaron Burton, Senior Environmental Planner  
Caltrans-District 8, Environmental Local Assistance

Prepared By: *Theresa Dickerson* Date: June 14, 2022  
Theresa Dickerson, Director Environmental Planning  
WSP USA, Inc.

The environmental review, consultation, and any other action required in accordance with applicable Federal laws for this project is being, or has been, carried out by Caltrans under its assumption of responsibility pursuant to 23 USC 326.

June 2022

## 1. Introduction

This document discusses *de minimis* impact determinations under Section 4(f). Section 6009(a) of SAFETEA-LU amended Section 4(f) legislation at 23 United States Code (USC) 138 and 49 USC 303 to simplify the processing and approval of projects that have only *de minimis* impacts on lands protected by Section 4(f). This amendment provides that once the U.S. Department of Transportation (USDOT) determines that a transportation use of Section 4(f) property, after consideration of any impact avoidance, minimization, and mitigation or enhancement measures, results in a *de minimis* impact on that property, an analysis of avoidance alternatives is not required, and the Section 4(f) evaluation process is complete. The Federal Highway Administration's (FHWA) final rule on Section 4(f) *de minimis* findings is codified in 23 Code of Federal Regulations (CFR) 774.3 and CFR 774.17.

Responsibility for compliance with Section 4(f) has been assigned to the USDOT pursuant to 23 USC 326 and 327, including *de minimis* impact determinations, as well as coordination with those agencies that have jurisdiction over a Section 4(f) resource that may be affected by a project action.

### 1.1. Regulatory Framework

Section 4(f) of the Department of Transportation Act of 1966, codified in federal law at 49 USC 303, declares that “it is the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites.”

Section 4(f) specifies that the Secretary [of Transportation] may approve a transportation program or project . . . requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site) only if:

- there is no prudent and feasible alternative to using that land; and
- the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

The Section 4(f) regulations (23 CFR 774.17) indicate that, with certain identified exceptions, a “use” of Section 4(f) property occurs:

- 1) When land is permanently incorporated into a transportation facility;
- 2) When there is a temporary occupancy of land that is adverse in terms of the statute’s preservation purpose as determined by the criteria in Section 774.13(d); or
- 3) When there is a constructive use of a Section 4(f) property as determined by the criteria in Section 774.15.

Section 4(f) resources include publicly owned public parks, recreational areas of national, state, or local significance, wildlife or waterfowl refuges or lands from a historic site of national, state, or local significance. Recreational areas can include formal and informal facilities, such as after-school public use of school playgrounds and recreational facilities. Historic sites are properties listed or eligible for inclusion on the National Register of Historic Places.

## 2. Description of the Proposed Project

The County of Riverside (County), in cooperation with the California Department of Transportation (Caltrans), proposes to replace the following two (2) existing scour critical and structurally deficient timber bridges along Railroad Avenue near Whitewater in Riverside County, California (see **Figure 1**):

- Railroad Avenue Bridge over Fornat Wash (Br. No. 56C0099)
- Railroad Avenue Bridge over East Channel Stubbe Wash (Br. No. 56C0101)

Railroad Avenue is an approximately 5.2-mile stretch of road that runs parallel to Interstate 10 (I-10) and the Union Pacific Railroad (UPRR). It connects the Haugen-Lehmann Way and I-10 at the east end and Main Street and I-10 at the west end. It mostly serves the sparsely populated Cabazon community. The average daily traffic (ADT) volume is approximately 211 vehicles. Periodically, the road carries detoured traffic from the heavily traveled I-10 when the freeway is temporarily closed for construction or emergency incidents. The road also serves as an access route for UPRR and utility maintenance crews. Therefore, it is important to maintain this frontage road in sound condition at all times.

The existing timber bridges carry two lanes (one lane in each direction) of traffic over Fornat and East Channel Stubbe Washes. The timber bridges are approximately 59 feet long and are 32 feet wide from curb-to-curb. The County proposes replacing the existing two 2-lane timber bridges along Railroad Avenue with new 2-lane modern bridges with a curb-to-curb roadway width of 32 feet at the same locations.

The bridges are listed in the federal Eligible Bridge List (EBL) as "Structurally Deficient (SD)" with a low Sufficiency Rating (SR) between 59.1 and 62.9. A sufficiency rating is essentially an overall rating of a bridge's fitness for the duty that it performs. The rating is based on a bridge's structural evaluation, functional/geometric obsolescence, and its essentiality to the public. A low sufficiency rating may be due to structural defects, narrow lanes, low vertical clearance, or any of many possible issues. A bridge is healthy when its SR is more than 80.0. Bridges with SR equal to or less than 80.0 and more than 50.0 require rehabilitation or widening. When the SR falls less than 50.0, bridge replacement shall be considered for public safety. Although the Railroad Avenue bridges carry a status flag of SD with SR ratings between 50 and 80 (qualifying for major rehabilitation), it was determined that the bridges are well beyond their 50-year service life and it would be more cost-efficient to replace the bridges. Additionally, a scour Plan of Action (POA) was performed on the bridges by the County in 2013. The POA recommended total replacement of the bridges as the most cost-effective option due to the extent of the scour, structural instability, and deterioration of various timber bridge elements.

The proposed Project would replace the existing 2-lane timber bridges with new 2-lane modern bridges. The proposed road width would consist of two 12-foot-wide travel lanes, one lane in each direction, and a 4-foot-wide shoulder on each side. Modern traffic barriers/railings meeting current Caltrans safety design standards would be constructed. The proposed bridges would be approximately 60 feet long depending on the channel hydraulic capacity and water surface freeboard requirements. Potentially the elevation of Fornat Wash Bridge may increase, but by no more than two feet to meet freeboard requirements. The East Channel Stubbe Wash Bridge elevation would remain the same. Additionally, approach roadway improvements would be

provided, and channel improvements would be administered to avoid future scour problems. It is envisioned that the channel bottom will remain earthen.

An existing underground telephone line along the north side of Railroad Avenue and suspended utilities (a 4-inch gas line and a telephone line) along the north side of the East Channel Stubbe Wash bridge would be affected by construction and may require relocation.

All construction activities, with the exception of a temporary construction easement (TCE) from the UPRR, would be conducted within the existing roadway right of way with construction staging and material laydown areas on the roadway itself. Railroad Avenue between the two bridges to be replaced would be closed to continuous traffic during construction. The construction duration would be approximately 12 months (about 6 months for each bridge). It is envisioned that the two bridges would be constructed one at a time to allow access to UPRR facilities and adjacent utilities from the Haugen-Lehmann Way/I-10 Interchange or the Main Street/I-10 Interchange. A Traffic Management Plan (TMP) would be prepared to address closure of the road and access to local utilities and properties.

The proposed construction would require a TCE from the UPRR for access to the channel bottom. However, construction activities are expected to stay at least 50 feet from the live rail tracks to eliminate any effects on railroad operations. The Railroad Avenue bridges abut adjacent State Bridges (Br. No. 56-166 and Br. No. 56-168) that carry I-10 traffic over the same washes. Structural modifications to the State Bridges are not anticipated; however, this will be evaluated during final design. An encroachment permit from Caltrans District 8 would be obtained prior to construction.

Figure 1. Project Location



Source: KOA, Traffic Technical Memorandum, 2019

### **3. Section 4(f) Properties**

#### **3.1 Pacific Crest Trail as a Recreational Facility**

The Pacific Crest Trail (PCT) is a world-renowned National Scenic Trail directly associated with the exponential growth of American outdoor recreation and conservation during the twentieth century. The PCT as it stands today, spans 2,650 total miles, beginning in Southern California at the Mexican border and continuing through California, Oregon, and Washington until reaching the Canadian border. The U.S. Forest Service (USFS) (an agency of the U.S. Department of Agriculture [USDA]) partners with the Bureau of Land Management (BLM), National Park Service, California State Parks, and the Pacific Crest Trail Association (PCTA) to provide effective management and protection of the PCT.

A portion of the PCT, approximately 373-feet, bypasses (by going underneath) the Union Pacific Railroad, Railroad Avenue, and the I-10 freeway between Cabazon (to the west) and Whitewater (to the east). This recorded portion is part of the transition between the San Jacinto Mountains to the south into the San Bernardino Mountains to the north and was established circa 1976. The trail is made up of loose, eroded rock or sediment that has been shaped by water flowing through the area during the rainy seasons. Due to the lower elevation and position under the East Channel Stubbe Wash bridge, hikers often use this segment of the trail as a resting spot to escape from the desert heat. The trail in this segment is a well-traversed path along an alluvial wash with no specific built features.

#### **3.2 Pacific Crest Trail as a Historic Resource**

The PCT was one of the first two trails, along with the Appalachian Trail, federally designated as a National Scenic Trail. The PCT links several existing trails, including the Oregon Skyline Trail, Cascade Trail, John Muir Trail, Lava Crest Trail, Tahoe-Yosemite Trail, Sierra Trail, and Desert Crest Trail, into a single route.

The PCT is associated with the growth of American outdoor recreation and conservation with a period of significance from 1935 (Pacific Crest Trail Conference) to 1993 (official dedication of entire trail). The PCT has not been previously evaluated for listing on the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR); however, for this Project, the trail is being treated as eligible under Criterion A/1. The PCT should be considered significant under Criterion A/1 at the national level with a period of significance from 1935, when the Pacific Crest Trail System Conference occurred, to 1993, when the entirety of the trail was officially dedicated. The portion of the PCT within the Area of Potential Effects (APE) retains sufficient integrity to convey its significance under Criterion A/1. The APE was developed as a part of the cultural studies and was utilized as the study area for the Section 4(f) analysis of historic properties.

Although the Project will have an effect on the PCT, this effect is not adverse because replacement of the East Channel Stubbe Wash Bridge (Bridge No. 56C0101) will not alter any of the characteristics of the PCT that qualify it for inclusion in the NRHP and CRHR.

Figure 2. Section 4(f) Resource



## 4. Section 4(f) Evaluation

### 4.1 De Minimis Impact

An impact to a Section 4(f) property may be determined to be *de minimis* if the transportation use of the Section 4(f) property, including incorporation of any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures), does not adversely affect the activities, features, or attributes that qualify the resource for protection under Section 4(f). For historic sites, *de minimis* impact means that the USDOT has determined, in accordance with 36 CFR part 800, that no historic property is affected by the project or that the project will have “no adverse effect” on the historic property in question. For parks, recreation areas, and wildlife and waterfowl refuges, a *de minimis* impact is one that will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f).

The Project would require two temporary closures of the PCT and detour of trail users. The two temporary closures are required during portions of construction involving removal of the East Channel Stubbe Wash bridge, excavation of abutment foundations, pile driving, and erection of precast girders. Closure of the trail would reduce the potential for trail users to be exposed to possible falling debris and heavy dust during construction. Each closure would last up to 10 days. The closures would be signed, and detour information provided at Tamarack Road and south of the UPRR tracks to identify the alternative crossing.

During trail closures, trail users would be re-routed to the West Channel Stubbe Wash where they could use the existing concrete I-10, Railroad Avenue, and UPRR underpass. The detour route was field verified and determined suitable to serve as a detour route. The vertical bridge clearance under I-10 and Railroad Avenue is 14 feet. The UPRR undercrossing has a vertical height of 9 feet and a cell width of 8 feet. Due to the limited vertical clearance of the UPRR underpass, equestrians would have to dismount and walk their horses through the undercrossing. Signs would be posted south of the UPRR undercrossing and north of the I-10 undercrossing alerting equestrians of the height restrictions at the UPRR undercrossing.

Except for the two, 10-day closures, a temporary protected crossing will be available at East Channel Stubbe Wash for the duration of construction. The protected crossing would have a vertical height of 12 feet and a cell width of 10 feet. During construction, hikers and equestrians would have the option to use the PCT or avoid construction noise and dust by using the West Channel Stubbe bypass. For the duration of construction, the contractor would be required to establish a warning mechanism (flaggers, whistles, etc.) to alert construction workers that hikers and equestrians are waiting to cross the construction site. Once alerted, all major construction activities that could affect the comfort of hikers and equestrians would be paused until the trail users have passed through the construction site. The expected wait time for trail users to be allowed passage through the construction site would be up to 30 minutes.

Closure information would be provided to managing agencies 90 days in advance of closures to provide 30 days' notice to trail users. Additional public notices would be posted to alert trail users of construction activities. If needed, flagmen, fencing, or other protective measures would be used to avoid potential conflicts between construction activities and trail users. Once construction is completed, any incidental or unanticipated damage or disrepair to the trail that may have resulted during construction would be restored to pre-construction conditions. Use of



the West Channel Stubbe Wash as a detour route would not require restoration activities after construction as no improvements are proposed.

### **Pacific Crest Trail as a Recreational Facility**

The Project is not expected to affect the integrity of the trail's setting in the long term. The PCT within this segment of the trail is not a designed landscape feature and the natural state of the area has not been modified. This resource's design, materials and workmanship are not as applicable as they would be for a designed historic structure or landscape; however, the existing features that are present do retain integrity.

Except for the two, temporary 10-day closures of the trail, during which the trail would be detoured to the adjacent West Channel Stubbe bypass, the trail would be maintained in its original, circa 1976 alignment, passing under the same bridges that were there at the time the route was designated. Therefore, the integrity of the trail's location would not be affected in the long term. Bridge construction would not affect elements of the visual setting, such as the regional landscape, existing visual elements (wind farms, UPPR, I-10 and associated billboards/signage, desert neighborhoods, etc.) or rural desert environment.

### **Pacific Crest Trail as a Historic Resource**

The existing timber bridge provides a physical tie to the past and a location for travelers to post signs, notes, and signatures. Replacement of the bridge with modern materials would alter the feeling and setting of the trail under Railroad Avenue. However, the trail is continuously shaped by the travelers themselves. It is expected that trail users would make use of the replacement structure for the same purpose. The importance of this segment of the PCT is that it provides a quiet, shady respite for hikers as they cross the desert. The replacement bridge will not alter the route of the trail and will offer the same important features. Therefore, while replacement of the original timber structure with modern materials would represent a high degree of change in the design, materials, and workmanship of the bridge, it does not represent a high level of overall change in those same elements for the PCT segment itself, as the changes are not extreme and would not compromise identification of the trail or its setting. Likewise, replacement of the bridge structure would not change the trail's association with 20th century outdoor recreation or feeling of association with a significant outdoor recreational experience. Caltrans has determined no historic properties will be adversely affected by this undertaking. The Division of Environmental Analysis, Cultural Studies Office submitted a Finding of No Adverse Effect to the State Historic Preservation Officer on March 10, 2022, and indicated that "Caltrans, as assigned by FHWA, intends to make a de minimis finding for Section 4(f) use of a historic property based on SHPO's concurrence on the Section 106 effect finding, pursuant to Section 6009(a) of SAFETEA-LU". SHPO concurred with the no adverse effect finding on June 8, 2022. Therefore, Caltrans intends to make a de minimis finding for the historic resource within the APE.

## 5. Measures to Minimize Harm

The PCT, a historic recreational trail and a protected Section 4(f) resource, is used by pedestrians and equestrians. During the two 10-day temporary trail closures, a detour route will be provided to allow continued access to the trail segments north and south of the construction site. The temporary detour would be located approximately 300 feet west of the existing trail segment at a concrete underpass (West Channel Stubbe Wash).

The following standard specifications and minimization measures would be implemented to minimize impacts to the trail and ensure trail user safety:

- Caltrans will provide the United States Forest Service (USFS), the Bureau of Land Management (BLM), and the Pacific Crest Trail Association (PCTA) with a schedule of work, schedule of closures, and detour plans for periods of closure 90 days in advance of closure to provide 30 days' notice to trail users.
- Signs will be posted north of the I-10 undercrossing at Tamarack Road and south of the UPRR undercrossing alerting equestrians of the height restrictions at the UPRR undercrossing.
- During construction a protected crossing will be provided at the East Channel Stubbe Wash, with the exception of the two 10-day trail closures, as an available option for hikers and equestrians to use.
- Caltrans Standard Specification (2018) 7-1.04. During construction, the contractor would be required to establish a warning mechanism (flaggers, whistles, etc.) to alert construction workers that trail users are waiting to pass through the construction site.
- Caltrans Standard Specification (2018) 5-1.39. Once construction is complete, any incidental or unanticipated damage or disrepair to the trail that may have resulted during construction would be restored to pre-construction conditions.

Based on Caltrans' Standard Specifications and minimization measures above, the Project's effect on the PCT and the resulting impacts satisfies the criteria for a *de minimis* impact determination.

## 6. Coordination

Pursuant to Section 4(f) of the Department of Transportation Act of 1966 (title 49 USC Section 303) and 23 CFR 774.17, the PCT is recognized as a Section 4(f) resource.

To fulfill the requirements of Section 4(f), coordination with officials with jurisdiction over a Section 4(f) resource is required and includes a discussion of impacts, avoidance alternatives, and mitigation. To complete the coordination process concurrence on the preliminary determination is sought from these agencies.

### **Coordination Among Agencies Concerned with a Recreational Resource**

In April 2019, a representative from the PCTA was contacted to help identify the Officials with Jurisdiction of the PCT. The PCTA identified the USFS and BLM as the owner and operator respectively. The PCTA, a non-profit agency that focuses on preserving, protecting, and promoting the PCT, also noted they would like to be involved in the Section 4(f) process as an interested party.

On April 2, 2020, the USFS (owner) and BLM (operator), were notified by mail of Caltrans' intent to make a *de minimis* impact determination for the PCT. The notification included a description of the project, an evaluation of potential impacts, suggested measures to minimize project effects and a request for concurrence on the *de minimis* determination. The U.S. Department of Agriculture (USDA) responded to the letter sent to the USFS on May 11, 2020, May 20, 2020, June 4, 2020, and July 1, 2020, requesting additional clarification on the potential impacts to the trail and accommodations for equestrians, and also recommended measures to reduce construction effects on trail users. Caltrans responded on May 20, 2020, June 3, 2020, and June 9, 2020, with the requested information and additional details regarding the physical configuration at each crossing (East and West Stubbe Channel Underpasses). A revised Section 4(f) concurrence letter containing updated information and revised minimization measures was submitted to the USDA on July 13, 2020, via email. On July 13, 2020 the USDA concurred with the *de minimis* finding. A copy of the USDA's concurrence letter is provided in Attachment A.

### **Coordination Among Agencies Concerned with a Historic Resource**

The Division of Environmental Analysis, Cultural Studies Office submitted a Finding of No Adverse Effect to the State Historic Preservation Officer on March 10, 2022, and indicated that "Caltrans, as assigned by FHWA, intends to make a *de minimis* finding for Section 4(f) use of a historic property based on SHPO's concurrence on the Section 106 effect finding, pursuant to Section 6009(a) of SAFETEA-LU". SHPO concurred with the no adverse effect finding on June 8, 2022.

## **7. Preliminary Finding**

Caltrans, on behalf of the FHWA, has made a preliminary determination that the Project would have a *de minimis* impact on the activities, attributes, or features that qualify the PCT for protection as a publicly owned recreational facility that is open to the public and as a historical resource. Caltrans will post a notification of this document at the project site for 30 days and will consider any public input received. Once Caltrans has received public input and concurrence from SHPO regarding these *de minimis* impact findings, Caltrans will make a final Section 4(f) determination, as delegated by FHWA.

# **Attachment A**

**Concurrence from Agencies**

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 8

DIVISION OF ENVIRONMENTAL PLANNING

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July 13, 2020

Ms. Togan Capozza  
Pacific Crest Trail Program Assistant  
U.S. Forest Service  
Pacific SW Region  
1323 Club Drive  
Vallejo, CA 94592

**Re: Railroad Avenue Bridge Replacement Project – Section 4(f) Evaluation**

Dear Ms. Capozza:

This letter is in follow up to our communication with Ms. Beth Boyst, Pacific Crest Trail Program Director, dated April 7, 2020. The letter was in regard to the California Department of Transportation District 8 (Caltrans) intention to issue a *de minimis* impact finding under Section 4(f) of the U.S. Department of Transportation Act of 1966. The *de minimis* impact finding is for the Pacific Crest Trail as part of the environmental compliance process for the proposed Railroad Avenue Bridge Replacement Project (Project). The intent of this letter is to incorporate information and clarification regarding impacts to the Pacific Crest Trail based on questions and comments received from the U.S. Forest Service between May and July 2020. As a public recreational trail, the Pacific Crest National Scenic Trail is afforded special protections under Section 4(f). A *de minimis* impact to a Section 4(f) resource is a nominal impact that would not be adverse to the activities, features, or attributes of the resource. A *de minimis* finding is conditioned upon:

- The official(s) with jurisdiction over the resource indicating, in writing, that the proposed action, including consideration of any mitigation, will not adversely affect the activities, features, and attributes that are important to the resource;
- The public has been afforded an opportunity (by public notice) to review and comment on the effects of the project on the protected activities, features, and attributes of the Section 4(f) resources; and
- Implementation of mitigation measures, if applicable.

The U.S. Forest Service provided comments and questions requesting additional clarification on the potential impacts to the Pacific Crest Trail and details on the proposed measures for protection of the Pacific Crest Trail and its users. Responses to those comments/questions and the additional information requested have been incorporated into this letter.

### **Effects of the Railroad Avenue Bridge Replacement Project on the Pacific Crest Trail**

The Pacific Crest Trail, which is administered by the U.S. Forest Service and managed by the Bureau of Land Management in this area, crosses under Railroad Avenue at the East Channel Stubbe Wash bridge, generally located west of Haugen-Lehmann Way and south of I-10 (**Figure 1, Project Site Map**).

The County of Riverside, in cooperation with Caltrans, proposes to replace the following two (2) existing scour critical and structurally deficient timber bridges along Railroad Avenue near Whitewater in Riverside County, California (**Figure 2, Project Location**):

- Railroad Avenue Bridge over Fornat Wash (Br. No. 56C0099) (Federal Aid Project No. BRLO-5956-228)
- Railroad Avenue Bridge over East Channel Stubbe Wash (Br. No. 56C0101) (Federal Aid Project No. BRLO-5956-229)

The Project would demolish and replace the existing 2-lane timber bridges with new, 2-lane modern concrete bridge structures. The proposed bridges would consist of two 12-foot-wide travel lanes, one lane in each direction, and a 4-foot-wide shoulder on each side. Modern traffic barriers/railings meeting current Caltrans safety design standards would be constructed. The proposed bridges would be approximately 60 feet long depending on the channel hydraulic capacity and water surface freeboard requirements. The elevation of Fornat Wash Bridge may increase, but by no more than two feet to meet freeboard requirements. The East Channel Stubbe Wash Bridge elevation would remain the same maintaining the existing 14-foot vertical clearance above the Pacific Crest Trail. Additionally, approach roadway improvements would be provided, and channel improvements would be administered to avoid future scour problems. The channel bottom will remain earthen.

Project construction is expected to begin in October 2023, depending on funding availability, and is expected to last about six to nine months. Although construction is scheduled to be completed by March, it is possible that construction could continue beyond that date and into the busy season for the Pacific Crest Trail (March 1 – May 31). A 42-foot long segment of the Pacific Crest Trail would be affected by demolition and construction of the East Channel Stubbe Wash Bridge. During portions of construction involving removal of the East Channel Stubbe Wash bridge, excavation of abutment

foundations, pile driving and erection of precast girders, the trail would be closed to protect trail users from heavy dust and possible debris. During these portions of construction, the trail would be closed to trail users. The closures would be temporary and would occur over two, 10-day windows during which trail users would be re-routed to another crossing just west of the existing trail alignment (**Figure 1, Project Site Map**).

Figure 1. Project Site Map





**Figure 2. Project Location**



Source: KOA, Traffic Technical Memorandum, 2019

## **Impacts to the Pacific Crest Trail**

### ***Direct Use***

The Build Alternative would not result in a direct use of the Pacific Crest Trail. A direct use would be a permanent acquisition of or permanent easement on a Section 4(f) property. The Project would be constructed entirely within the roadway right-of-way with construction staging and storage on the roadway itself. The project would not require permanent acquisition of additional right-of-way or an easement on adjacent or intersecting properties.

### ***Temporary Use***

The Project would require two temporary closures of the Pacific Crest Trail and detour of trail users. The two temporary closures are required during portions of construction involving removal of the East Channel Stubbe Wash bridge, excavation of abutment foundations, pile driving, and erection of precast girders. Closure of the trail would reduce the potential for trail users to be exposed to possible falling debris and heavy dust during construction. Each closure would last up to 10 days. The closures would be signed, and detour information provided at Tamarack Road and south of the Union Pacific Railroad tracks to identify the alternative crossing.

During trail closures, trail users would be re-routed to the West Channel Stubbe Wash where they could use the existing concrete I-10, Railroad Avenue, and Union Pacific Railroad (UPRR) underpass. The detour route was field verified and determined suitable to serve as a detour route. The vertical bridge clearance under I-10 and Railroad Avenue is 14 feet. The UPRR undercrossing has a vertical height of 9 feet and a cell width of 8 feet. Due to the limited vertical clearance of the UPRR underpass, equestrians would need to dismount and walk their horses through the undercrossing. Signs will be posted south of the UPRR undercrossing and north of the I-10 undercrossing alerting equestrians of the height restrictions at the UPRR undercrossing.

Except for the two, 10-day closures, a temporary protected crossing will be available at East Channel Stubbe Wash for the duration of construction. The protected crossing would have a vertical height of 12 feet and a cell width of 10 feet. During construction, hikers and equestrians would have the option to use the Pacific Crest Trail or avoid construction noise and dust by using the West Channel Stubbe bypass. For the duration of construction, the contractor would be required to establish a warning mechanism (flaggers, whistles, etc.) to alert construction workers that trail users are waiting to cross the job site. Once alerted, all major construction activities that could affect the comfort of

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trail users would be paused until hikers or equestrians have passed through the job site. The expected wait time for trail users to be allowed passage through the construction site would be up to 30 minutes.

Closure information would be provided to managing agencies 90 days in advance of closures to provide 30 days' notice to trail users. Additional public notices would be posted to alert trail users of construction activities. If needed, flagmen, fencing or other protective measures would be used to avoid potential conflicts between construction activities and trail users. Once construction is completed, any incidental or unanticipated damage or disrepair to the trail that may have resulted during construction would be restored to pre-construction conditions. Use of the West Channel Stubbe Wash as a detour route would not require restoration activities after construction as no improvements are proposed.

#### ***Constructive Use***

The Project would not result in a constructive use of the Pacific Crest Trail. A constructive use would occur if there are proximity impacts, such as noise or visual intrusions, which substantially impairs the purpose of the property. The trail would remain open during construction with trail users being re-routed to an alternate crossing during specific periods of construction to reduce conflicts between trail users and construction activities. All construction would occur within the existing roadway right-of-way with staging and storage on the roadway itself. Construction would occur during daytime hours to minimize the effects of construction noise during evening hours when the trail segment under Railroad Avenue might be used for overnight stays. None of the proposed construction activities would result in an indirect impact on the Pacific Crest Trail.

#### ***De Minimis Impact Finding Determination***

While the extent of project improvements is under review, Caltrans has preliminarily determined that the project would result in *de minimis* impacts to the Pacific Crest Trail under Section 4(f) because the activities, features, and attributes of the trail would not be adversely affected as discussed above. Therefore, Caltrans is requesting the U.S. Forest Service concurrence with this *de minimis* impact finding determination as required under Section 4(f) in 23 CFR 774. For your convenience, a signature block is provided as an attachment to this letter. Your concurrence is needed to continue to maintain the schedule of the project. Therefore, please provide concurrence on or before August 13, 2020.

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Should you have any questions about the Section 4(f) process or would like to discuss the project in more detail, please do not hesitate to contact me (aaron.burton@dot.ca.gov or 909-383-2841).

Sincerely,

*Aaron Burton*

Aaron Burton, Senior Environmental Planner,  
District 8 Local Assistance – Environmental Support

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Based on the findings above, I concur with the *de minimis* conclusion presented in the Section 4(f) Evaluation for the segment of the Pacific Crest Trail that crosses under Railroad Avenue that has been evaluated as part of the environmental compliance process for the Railroad Avenue Bridge Replacement Project.

**ELIZABETH BOYST**  
Digitally signed by  
ELIZABETH BOYST  
Date: 2020.07.20  
15:44:15 -07'00'

July 20, 2020

\_\_\_\_\_  
Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Pacific Crest Trail Administrator

\_\_\_\_\_  
Title

\_\_\_\_\_  
USDA, Forest Service

\_\_\_\_\_  
Agency

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